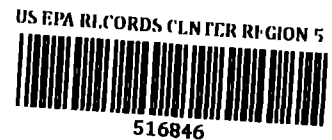


UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION



In re:	)	Chapter 11
	)	
Eagle-Picher Holdings, Inc., et al.,	)	Jointly Administered
	)	Case No. 05-12601
Debtors.	)	
	)	Judge Jeffrey P. Hopkins.

***CUSTODIAL TRUSTEE'S MOTION TO SHORTEN RESPONSE TIME REGARDING  
CUSTODIAL TRUSTEE'S MOTION FOR NON-ORAL HEARING BY THE BANKRUPTCY  
COURT OF MOTION BY WILLIAM L. WEST, CUSTODIAL TRUSTEE OF THE EP  
CUSTODIAL TRUST TO ENTER ORDER AMENDING CUSTODIAL TRUST AND  
PROVIDE FOR A TRANSFER OF THE SUM OF \$100,000.00 FROM THE HILLSDALE  
TRUST ACCOUNT TO THE ADMINISTRATION TRUST ACCOUNT OF THE EP  
CUSTODIAL TRUST ("TRANSFER MOTION") (ECF NO. 3553)***

William L. West (the "Custodial Trustee"), Custodial Trustee of the EP Custodial Trust (the "Trust"), by and through counsel, submits the following Motion to Shorten Response Time ("Motion to Shorten") Regarding *Custodial Trustee's Motion for a Non-Oral Hearing by the Bankruptcy Court of Motion by William L. West, Custodial Trustee of the EP Custodial Trust to Enter an Order Amending the Custodial Trust and Provide for a Transfer of the Sum of \$100,000 from the Hillsdale Trust Account to the Administration Trust Account of the EP Custodial Trust (ECF No. 3553) (the "Non Oral Hearing Motion")*, a copy of which is attached as Exhibit A.

In support of this Motion to Shorten, the Custodial Trustee states as follows:

1. The Custodial Trustee filed the Transfer Motion<sup>1</sup> on April 20, 2015. The Transfer Motion seeks to transfer \$100,000 from the Hillsdale Escrow Account to the Trust's Administration Account in order to continue remediation of the Hillsdale Site and pay bills.

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<sup>1</sup> Unless otherwise set forth herein, capitalized terms shall have the same meaning as are contained in the various papers filed with this Court associated with the Transfer Motion.

2. Since the filing of the Transfer Motion, there has been one objection to the Transfer Motion filed by EPMC Holdings Corporation ("EPMC Objection") (ECF No. 3554), as well as a Reply in support of the Transfer Motion filed by the United States Environmental Protection Administration ("USEPA") (ECF 3567) on June 11, 2015, and the Michigan Department of Environmental Quality ("MDEQ") (ECF 3566 on June 11, 2015). The Custodial Trustee has filed a reply to the EPMC Objection on May 28, 2015 (ECF No. 3565).
3. On May 12, 2015, this Court scheduled a hearing on the Transfer Motion for July 7, 2015, at 9:00 AM.
4. After having reviewed the EPMC Objection, as well as Replies in support filed by USEPA and MDEQ as is more completely set forth in the Hearing Motion attached hereto as Exhibit A, the Custodial Trustee believes that there is sufficient data and argument currently before the Bankruptcy Court for the Court to dispose of the Transfer Motion without a hearing. Accordingly, the Custodial Trustee has prepared and intends to file with this Court a copy of the Hearing Motion which is attached hereto as Exhibit A.
5. There is insufficient time under the Local Rules of the United States District Court for the Southern District of Ohio (the "Local Rules") to allow any opposition to the Hearing Motion and have the Hearing Motion heard by this Court before July 7, 2015.
6. Accordingly, the Custodial Trustee respectfully requests that the Court enter an order shortening the response time to the Hearing Motion so that any objection to the

Hearing Motion must be filed within five (5) days of the date that the Hearing Motion is filed or by July 1, 2015.

WHEREFORE, the Custodial Trustee respectfully requests an Order of this Court shorting the response time to the Hearing Motion and establishing that any Memorandum in Opposition to the Hearing Motion be filed no later than five (5) days after the Hearing Motion is filed with this Court, and further, the Custodial Trustee seeks any other relief that the Court deems just and equitable.

Respectfully submitted,

/s/ M. Colette Gibbons  
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*Attorneys for Custodial Trustee*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 24th day of June, 2015 a true and correct copy of the foregoing *MOTION TO SHORTEN RESPONSE TIME REGARDING CUSTODIAL TRUSTEE'S REQUEST FOR NON-ORAL HEARING BY THE BANKRUPTCY COURT OF MOTION BY WILLIAM L. WEST, CUSTODIAL TRUSTEE OF THE EP CUSTODIAL TRUST TO ENTER ORDER AMENDING CUSTODIAL TRUST ANR PROVIDE FOR A TRANSFER OF THE SUM OF \$100,000.00 FROM THE HILLSDALE TRUST ACCOUNT TO THE ADMINISTRATION TRUST ACCOUNT OF THE EP CUSTODIAL TRUST ("TRANSFER*

*MOTION*”) was filed electronically this 24th day of June, 2015. Notice of this filing will be sent to all parties *via* the Court’s electronic filing system. Parties may access this filing through the Court’s system.

In addition, the following parties were served *via* Federal Express:

EPMC Holdings Corporation  
801 West Ann Arbor Trail, Suite 220  
Plymouth, MI 48170  
Attention: President

Stephen D. Lerner, Esq.  
Squire Patton Boggs  
312 Walnut Street, Suite 3500  
Cincinnati, OH 45202

Cindy Woodward  
U.S. Bank National Association  
Corporate Trust Services  
60 Livingston Avenue  
St. Paul, Minnesota 55107

Erin Rednour  
Federal Site Remediation Section  
Illinois EPA  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794-9276

James Morgan, Senior Assistant Attorney General  
Office of Illinois Attorney General  
Environmental Bureau  
500 South Second Street  
Springfield, IL 62706

Chris Carey, Successor to Rick L. Bean  
Kansas Department of Health and  
Environment  
Remedial Section, Bureau of Environmental Remediation  
Curtis State Office Building  
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Tim Kern or his successor  
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Environmental Enforcement Section  
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**The following parties were served *via* United States Certified Mail:**

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Ms. Celeste Gill  
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Section Chief  
Environmental Enforcement Section  
Environment and Natural Resources Division  
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River Rouge, MI 48218

Official Wayne County, Michigan  
Environmental Services  
400 Monroe  
International Center Bldg  
Detroit, MI 48226

Shelby County Commissioners Office  
129 East Court Street, Suite 100  
Sidney, OH 45365

Official in Charge  
Cherokee County, Kansas  
110 W. Maple  
Columbus, KS 66725

**The following parties were served *via* E-Mail:**

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/s/ M. Colette Gibbons  
M. Colette Gibbons

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